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ENVIRONMENTAL

WA 2917

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01-22-92

Carrie -

FYI - here's the letter
that prompted our response
(01-21-92) to Tom Eaton.

I guess it was Ecology's
Christmas present to us -
we would have preferred
the draft permits!

Please call me at 223-0500
if you have any questions.

Thanks -

Cathy Butler

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RCRA PERMITS SECTION

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USEPA RCRA



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STATE OF WASHINGTON

CE... INC

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-3571 • (206) 459-6000

December 24, 1991

Michael Keller
Dennis Stefani
Chemical Processors Inc.
2203 Airport Way South
Suite 400
Seattle, WA 98134

Re: Changes to RCRA Part B Permit Applications

Dear Mr. Keller and Mr Stefani:

I understand Chemical Processors (Chempro) has recently submitted revisions to the RCRA Part B Permit Applications for two facilities, Washougal and Pier 91. These revisions arrived after Ecology had spent considerable time reviewing the existing applications and was prepared to issue Draft Permits. The last minute changes mean that my staff has wasted time and energy reviewing material that is now irrelevant. I also understand that this is the second time this has happened for the Pier 91 facility.

In this time of limited resources, I cannot have my staff waste their valuable time reviewing applications that are not current. Mike, at SWAC meetings in the past, you have expressed concern about the ability of the State to process permits. We have tried to respond to this concern by centralizing permits and devoting more staff to permit processing. Changing applications at the last step is not helping. Although I recognize the impact a changing business environment has on your operations, Chempro must decide early in the process what the facility will be. The permit modification process is designed to accommodate changing business needs, and should be used for any minor changes that may be necessary after permit issuance.

Please discuss these issues with your staff and call me at 459-6316 if you would like to discuss this further.

Sincerely,

Tom Eaton, Manager
Solid and Hazardous Waste Program